

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON NON-REVISION PTO 298  
(ELECTION WAVE) CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF  
MICHAEL P. WOODS, M.D. FOR NON-REVISION PTO 298 (ELECTION WAVE)**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to Michael P. Woods for Ethicon Wave 1, Dkt. 2041 (motion), Dkt. 2043 (memorandum in support), Dkt. 2234 (reply); and, the reply brief filed in Ethicon Wave 3, Dkt. 3051 (reply). Plaintiffs respectfully request that the Court exclude Michael P. Woods' testimony, for the reasons expressed in the Wave 1 and 3 briefing. This notice applies to the following the Non-Revision PTO 298 (Election Wave) cases identified in Exhibit A attached hereto.

Dated: December 14, 2018

Respectfully submitted,

/s/ D. Renee Baggett

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**EXHIBIT A**

Adams, Stacy Hamlin	2:15-cv-03828
Crandall, Lisa L.	2:14-cv-02955
Foley, Teresa	2:16-cv-00433
Fuller, Maribeth	2:14-cv-17367
Genone, Toni	2:13-cv-13855
Haines, Nancy	2:13-cv-25829
Hartzell, Kerry	2:16-cv-06520
Lockwood, Kristi J.	2:15-cv-11084
Lockwood, Maria	2:12-cv-07649
Maschler, Bonnie Marie	2:13-cv-20646
McCubbins, Brenda	2:13-cv-07511
Miller, Joy J.	2:13-cv-08507
Nedela, Nan	2:15-cv-07981
Smallridge, Audrey	2:12-cv-02956
Smithberg, Linda	2:14-cv-10469
Stephens, Tammy	2:13-cv-13080
Thompson, Patricia Z.	2:14-cv-07173
Webb, Christine	2:12-cv-03136
Winsborough, Shannon P.	2:15-cv-03129
Zember, Cynthia	2:12-cv-08211

**CERTIFICATE OF SERVICE**

I hereby certify that on December 14, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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